Applicant: Andrew Eric Carlson Attorney's Docket No.: 09712-119001 / Z-265

Serial No.: 09/940,076 Filed: August 27, 2001

Page : 6 of 7

REMARKS

This reply is being filed together with a Request for Continued Examination.

Claims 21-32 are pending. Claims 21 and 32 are the independent claims.

The previously pending set of claims (claims 1-20) have been canceled, without prejudice, and replaced with a new set of claims (claims 21-32). In canceling claims 1-20, we do not concede the merits of the prior art rejections in the Final Action and reserve the right to pursue an identical set of claims in a continuation application.

The prior set of claims stand rejected as either anticipated or obvious in view of Sommargren (U.S. Patent No. 4,859,066). We submit that Sommargren neither describes or suggests the subject matter recited in claims 21-32.

In particular, Sommargren does not describe or suggest "a polarizing beam splitter block having (i) multiple output ports on a common face of the block, each output port positioned to transmit from within the block a corresponding intermediate beam derived from a common input beam, and (ii) a polarizing beam splitting interface internal to the block and positioned to separate each intermediate beam into a measurement component and a reference component having different polarizations," as recited in indepedent claims 21 and 32.

To the contrary, beamsplitter 14 and mirror 18, which Sommargren uses to generate intermediate beams 16 and 17, are completely separate from polarization beamsplitter 80 (see Figure 1). Thus, polarization beamsplitter 80 fails to include "a polarizing beam splitter block having ... [the] multiple output ports" as recited in claims 21 and 32.

Furthermore, beamsplitter 14 and mirror 18 in Sommargren transmit intermediate beams 16 and 17 into polarization beamsplitter 80 from outside of it (see Figure 1). In contrast, claims 21 and 32 recite "each output port positioned to transmit from within the block a corresponding intermediate beam derived from a common input beam" (emphasis added).

Finally, even if there were some motivation to integrally attach beamsplitter 14 and mirror 18 to polarization beamsplitter 80 in Sommargren (something we do not concede), it is unclear how they could be attach to define multiple output ports "on a common face of the

Applicant: Andrew Eric Carlson Attorney's Docket No.: 09712-119001 / Z-265

Serial No. : 09/940,076 Filed : August 27, 2001

Page : 7 of 7

block" and how such multiple output ports would "transmit from within the block corresponding intermediate beam[s]," as recited by claims 21 and 32 (emphasis added).

We submit that the remaining dependent claims are allowable over Sommargren for at least the same reasons as those above for independent claims 21 and 32.